

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Miami Division

CASE NO. 1:25-CV-23232-GAYLES

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE  
WALL STREET JOURNAL, a Delaware  
corporation, NEWS CORPORATION, a Delaware  
corporation, KEITH RUPERT MURDOCH, an  
individual, ROBERT THOMSON, an individual,  
KHADEEJA SAFDAR, an individual, and JOSEPH  
PALAZZOLO, an individual,

Defendants.

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**MOTION FOR ANDREW J. LEVANDER, ESQ. TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida and Rule 2B of the CM/ECF Administrative Procedures, the undersigned respectfully moves for the admission *pro hac vice* of Andrew J. Levander, Esq., of the law firm of Dechert LLP, Three Bryant Park, 1095 Avenue of the Americas, New York, New York 10036-6797, Telephone: (212) 698-3512 for purposes of appearance as co-counsel on behalf of Defendants Dow Jones & Company, Inc., d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo (“Defendants”) in the above-captioned action only and to permit Andrew J. Levander, Esq., to receive electronic filings in this case. In support thereof, the undersigned states as follows:

1. Andrew J. Levander, Esq., is not admitted to practice in this Court. He is a member in good standing and currently eligible to practice law in the State of New York and District of Columbia and is a member of the United States District Court for the Southern District of New York.

2. Movant, Eric C. Edison, Esq., of the law firm of Gunster, Yoakley & Stewart, P.A., 450 E. Las Olas Blvd., Suite 1400, Fort Lauderdale, Florida 33301, Telephone: (954) 462-2000, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Andrew J. Levander, Esq., has made payment of this Court's \$250.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Andrew J. Levander, Esq., by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Andrew J. Levander, Esq., at the following email addresses: [andrew.levander@dechert.com](mailto:andrew.levander@dechert.com) and [nycmanagingclerks@dechert.com](mailto:nycmanagingclerks@dechert.com).

WHEREFORE, Movant, Eric C. Edison, Esq., moves this Court to enter an Order permitting Andrew J. Levander, Esq., to appear before this Court on behalf of Defendants Dow Jones &

Company, Inc., d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Andrew J. Levander, Esq.

Dated: September 22, 2025

**GUNSTER, YOAKLEY & STEWART, P.A.**

/s/ Eric C. Edison

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CORPORATION, KEITH RUPERT MURDOCH,  
ROBERT THOMSON, KHADEEJA SAFDAR, and  
JOSEPH PALAZZOLO*

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PALAZZOLO, an individual,

Defendants.

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**CERTIFICATION OF ANDREW J. LEVANDER, ESQ.**

Andrew J. Levander, Esquire, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of and currently eligible to practice law in the State of New York and District of Columbia and a member of the United States District Court for the Southern District of New York; and (3) I have not filed three or more motions for pro hac vice admission in this District within the last 365 days.

/s/ Andrew J. Levander

Andrew J. Levander, Esq.